

## Policy SDL1 Landscape Character (previously Policy SD4)

Number of comments on policy: 61

Number of additional responses to technical questions: n/a

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
12	20	7	6	3	13

### Summary of issues and key themes raised

Respondents call for development proposals to be integrated with comprehensive landscape assessments that enhance conservation, heritage, and public amenity while incorporating high-quality design features such as native planting and inclusive public spaces. They recommend clearer, simpler policy language and definitions to distinguish between built and natural features, and suggest flexible phrasing (eg, using “or” instead of “and”) to allow for context-sensitive application, including consideration of temporary impacts and dynamic landscape changes. Several comments seek closer alignment with statutory planning frameworks and environmental guidance. Feedback also highlights a desire for robust, transparent procedures for implementing and enforcing the policy, along with suggestions for improvements in local connectivity and green corridor retention, and wording on historic environment. Several comments were received seeking this policy to be applied in the setting of the National Park.

#### Key themes raised:

- Integration of Development with Landscape Conservation
- Heritage Value
- Balancing Prescriptive Controls and Flexibility
- Alignment with National Planning Policy Framework and Section 245 of the Levelling-Up and Regeneration Act 2023
- Clarity and Precision in Policy Wording
- The Setting of the National Park
- Dynamic Nature of Landscape Character

### Overview of SDNPA response and way forward for the Local Plan

The policies in the South Downs Local Plan can only be applied in the South Downs National Park. The Authority, via the duty-to-cooperate, engages with neighbouring planning authorities on the preparation of their local plans and on certain planning applications regarding the setting of the National Park.

The Development Plan must be read as a whole. This policy, SDC3, and SDL2 should be read together as complementary policies that set out a regenerative and landscape-led approach. This is explained in the supporting text. A number of comments (i.e., around active travel, biodiversity, design, health and wellbeing, historic environment, tree planting, and transport) are addressed in other policies (or in adopted supplementary planning documents) and do not need to be repeated in Policy SDL1.

Policy SDL1 is considered to be sound, aligning with the National Planning Policy Framework, the purposes of the National Park, and other policies in the Plan. In response to relevant comments on the wording of SDL1:

- Townscape and historic environment are part of landscape character and this has been reflected in policy wording amendments and new supporting text.
- The supporting text includes references and clarity on landscape elements and features, and enhancements to, and positive elements of, the landscape.
- The supporting text and guidance list includes references and clarity around Landscape and Visual Impact Assessments (LVIAs) which are already a requirement in the South Downs Local Validation List.

In relation to comments about temporary uses (including festivals), such matters are covered in professional best-practice guidance and may require consideration of cumulative impacts at the planning application stage.

A number of comments received are either outside the scope of this strategic policy, relate to specific sites or planning applications, or are focused on implementation and enforcement rather than the wording of the policy.

## Policy SDL2 Design (previously Policy SD5)

Number of comments on policy: 70

Number of additional responses to technical questions: n/a

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
10	25	5	6	5	39

### Summary of issues and key themes raised

Respondents stress the need for improved design quality and public realm measures that better cater to pedestrians and cyclists through safe, attractive routes and enhanced green infrastructure (active travel and sustainable transport), while preserving local character via sensitive material use and scale. They call for unambiguous definitions of terms like “landscape-led approach” and “enhancing settlement edges”, along with explicit references to local planning documents such as village/parish design statements. Concerns over environmental sustainability focus on rigid technical requirements for sustainable drainage, waste management, and utility infrastructure, prompting suggestions for flexible, site-specific measures. Stronger enforcement mechanisms and proportionate developer guidance - especially for smaller projects - is also requested, with additional feedback urging improved clarity, consistency and alignment with national design guidelines. Additional criteria for healthy design principles is also sought.

#### Key themes raised:

- Design Quality and the Public Realm
- Local Character, Landscape, and Heritage Integration
- Utility Infrastructure
- Sustainable Transport and Active Travel Infrastructure
- Clarity and Enforcement Mechanisms
- Sustainable Drainage and Flood Resilience

### Overview of SDNPA response and way forward for the revised Local Plan

The purpose of SDL2 is to ensure that development is of the highest possible design quality which reflects and respects the exceptional quality of the natural, agricultural, and built environment of the National Park. It is, therefore, connected to Purpose 1 of the National Park to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.

The Development Plan must be read as a whole. A number of comments (i.e., around active travel, green and blue infrastructure, sustainable construction and renewable energy) are addressed in other policies and do not need to be repeated in SDL2.

Policy SDL2 is a strategic and National Park wide policy which is applicable to all scales of development, ranging from householder development to major development. This means that it cannot address all site specific or individual circumstances or scenarios. For this reason, requested changes have not been actioned that would make the policy either too detailed and/or too technical.

Policy SDL2 does not preclude contemporary design providing that it is contextually appropriate. The policy maintains flexibility through the use of “as appropriate” to allow professional judgement on a case-by-case basis. In reviewing all comments received, the policy wording has been strengthened or clarified, with new supporting text added for further clarification. For example:

- The policy wording includes appropriate references to active travel, green infrastructure, health and wellbeing, natural surveillance, settlement edge, sustainable drainage, townscape (as part of landscape), and views.
- The new supporting text includes references and clarity around townscape, views, parish and village design statements, enhancing settlement edges, and views.
- The guidance section includes references the National Model Design Code, parish and village design statements, and noise guidance.
- Key terms explained in supporting text and/or glossary.

## Policy SDL3 Safeguarding Views (previously Policy SD6)

Number of comments on policy: 50

Number of additional responses to technical questions: n/a

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
13	13	7	6	1	10

### Summary of issues and key themes raised

Respondents noted that development should conserve and enhance the national park's visual integrity through modest, sympathetic design incorporating transitional and landscape-led features, with a call for clearer policy wording—particularly regarding terms like “sequential views” and “key features.” They also recommended extending safeguarding measures to include lands immediately adjacent to the park and iconic views, in line with legislative provisions such as s245 of the Levelling Up and Regeneration Act 2023. Comments sought reference to local planning documents such as neighbourhood development plans and parish/village design statements that include locally important views. Concerns were raised about inconsistent enforcement and regulatory compliance, as well as the potential impact on sectors such as farming, estates, and commercial uses, alongside suggestions for improved stakeholder consultation and clearer guidelines on design and urban–rural transitions.

#### Key themes raised:

- Balancing Development with Landscape Quality
- Scope and Boundary Considerations
- Design Considerations

### Overview of SDNPA response and way forward for the Local Plan

The purpose of SDL3 is to ensure that development does not harm views or features of the landscape to encourage conservation and enhancement of key view types and patterns, and to ensure development does not detract from the visual integrity, identity and scenic quality that are characteristic of the National Park. This is particularly relevant to the two statutory purposes of the National Park which are to conserve and enhance natural beauty, wildlife, and heritage of the area, and to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

The policies in the South Downs Local Plan can only be applied in the South Downs National Park. The Authority, via the duty-to-cooperate, engages with neighbouring planning authorities on the preparation of their local plans and on certain planning applications.

#### Actions to address comments on this policy include:

- It is considered that the word “only” is in the correct place.
- The new supporting text provides further information on “sequential views”.

- Information and sources about important local views are included in the new supporting text and listed in the “guidance” section of the policy – this includes neighbourhood development plans.

Concerns were raised on changing “key landmarks” to “key features”. The reason for this wording change is to align with language elsewhere in the Local Plan. Landscape features are defined in the glossary. Landmarks can often be thought of as built form, while the term “features” recognises a broader definition. Ultimately, the policy remains focused on the integrity, identity, and scenic quality of the National Park.

The Development Plan must be read as a whole and a number of issues raised (i.e., agricultural development, agricultural diversification, rural building conversions, design, and viticulture) are addressed in other policies in the Plan (or supplementary planning documents, such as the South Downs Design Guide SPD) and do not need to be repeated in Policy SDL3.

It is not possible for the policy to give specifics on exactly what on the ground actions should be taken in the design to conserve and enhance views as it will depend on the nature of the development and the topography and features of the landscape at that location. The South Downs Design Guide SPD does provide examples of good design principles that can be applied to respond to views.

A number of comments either do not relate to this policy, or relate to a particular site, or the implementation (rather than wording) of this policy.

## Policy SDL4 Relative Tranquillity (previously Policy SD7)

Number of comments on policy: 40

Number of additional responses to technical questions: n/a

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
8	13	8	3	2	7

### Summary of issues and key themes raised

Respondents noted that accessible, tranquil natural spaces support social wellbeing and cultural value by providing areas for reflection and mental health recovery, and the policy is seen as a means to protect these benefits by reducing noise and visual disturbances. They urged clearer, more precise wording and a broader scope that aligns with similar policies, including objective noise measurements (often suggested as +10 dB above ambient) and enforceable planning conditions. Concerns were raised about ambiguous language in regard to “relative” tranquillity, and the potential impacts of increased traffic, higher visitor numbers, and concentrated development on both the natural setting and visual quality of key areas. Calls for enhanced transparency, stakeholder engagement on specific development proposals, and better management of non-development activities also emerged, with suggestions for clearer definitions and measurable criteria to ensure that the policy effectively balances public access with the preservation of tranquillity.

#### Key themes raised:

- Social Wellbeing and Cultural Value
- Policy Scope, Enforcement and Integration
- Definition and Clarity
- Traffic, Visitor and Development Impacts

### Overview of SDNPA response and way forward for the revised Local Plan

The policies in the South Downs Local Plan can only be applied in the South Downs National Park. The Authority, via the duty-to-cooperate, engages with neighbouring planning authorities on the preparation of their local plans and on certain planning applications. A Visitor Accommodation Study has been published which identifies areas of high visitor numbers – i.e., hotspots and honeypots. The Development Plan must be read as a whole, and so visitor development in these identified areas will also be considered alongside Policy SDE7 and all other material planning considerations.

The purpose of SDL4 is to ensure development does not harm the tranquillity of the countryside so that people can enjoy this special quality of the National Park. SDL4 recognises areas where tranquillity may be compromised or poor, and requires development in these areas to take opportunities to improve tranquillity where they exist.

Noise: Tranquillity involves a range of factors, not just noise. For most applications in the National Park, requiring noise measurements would be disproportionate. There are separate criteria in SDL2 which seek to protect amenity, including from noise.

Surfacing: The requested requirements for specific sorts of surfaces is a matter which is considered too detailed for this strategic policy. The local plan requires a landscape-led approach and different surfaces will be appropriate in different circumstances.

Changes: A number of comments are either already addressed in the policy wording, outside the scope of a local plan or this policy, or relate to a specific site and so would not be appropriate to consider in this strategic and National Park wide policy. In response to comments relevant to the wording and scope of this policy:

- It is considered that the word “only” is in the correct place.
- The reference to “PRoW” has been changed to active travel.
- Further information on the term “relative tranquillity”, actions which enhance tranquillity, how tranquillity is assessed, and different environments in the National Park, has been added to the new supporting text.

## Policy SDL5 Dark Night Skies (previously Policy SD8)

Number of comments on policy: 47

Number of additional responses to technical questions: n/a

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
14	15	9	5	1	21

### Summary of issues and key themes raised

Respondents raised concerns that developments outside the National Park near heritage coast and national park areas risk undermining environmental heritage and disrupting nocturnal ecology through increased traffic, pollution and excessive lighting. They called for including stricter controls on light spillage and clearer enforcement strategies, while also highlighting that current controls do not adequately address internal sources such as large glazed areas. Feedback noted conflicts between dark skies protection and new planning priorities, recommended regular technological updates and design adaptations and clearer policy wording. Additional suggestions focused on managing street lighting levels, imposing stricter lumen limits and developing a detailed mapping of dark sky zones. Several comments raised the importance of cross-boundary coordination and sought the extension of this policy to areas outside the National Park.

#### Key themes raised:

- Social Wellbeing and Cultural Value
- Policy Scope, Enforcement and Integration
- Definition and Clarity
- Traffic, Visitor and Development Impacts

### Overview of SDNPA response and way forward for the revised Local Plan

Overall support for the policy is noted.

In response to comments, amendments include:

- Stronger references to wildlife and dark corridors including in criterion 1 and criterion 2 and supporting text.
- Explicit inclusion of internal light sources into the policy in criterion 2 and supporting text
- Minor amendments for clearer structure and wording in policy and supporting text
- Reference to standards and guidance in the supporting text.

#### Other key matters raised

Requests were made to apply the policy in ways which are not possible:

- The Local Plan cannot apply to areas outside the National Park boundary.
- Lighting issues outside SDNPA or from existing buildings cannot be controlled through this policy.

- Only lighting that forms part of a planning application can be addressed; some lighting forms (e.g., private garden lighting) remain outside planning control.

Enforcement:

- Enforcement can only take place where lighting breaches conditions on a planning permission.
- Broader concerns about poor lighting or lack of adherence often fall outside the planning system.

Concerns were raised regarding safety and crime prevention:

- The SDNPA acknowledges the need for safety lighting which will meet the criteria.
- Safety concerns are addressed where the need for safety lighting is clearly justified as necessary and appropriate. The policy requires that the impact be minimised, and this is achieved by using the correct illuminances, which are set by the lighting designer in relation to the task area's risk assessment. The SDNPA cannot supersede this assessment and only asks that the level of illuminance be justified and appropriate. This is verified within the planning process, where applicants must reference the adopted standard.

**Policy SDL6 Historic Environment and Cultural Heritage (previously Policy SD12 and Policy SD14)**

Number of comments on policies: 62

Number of additional responses to technical questions: n/a

**Reaction to Regulation 18 Consultation**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
6	11	7	6	1	12

**Summary of issues and key themes raised**

Respondents recommended revising the policy to better balance conservation with enabling development by broadening its scope to include cultural heritage and non-designated assets, such as those in the agricultural landscape. They advised that proposals be assessed on a case-by-case basis using clear, proportionate decision-making criteria and detailed guidance on when a heritage impact statement is necessary and what evidence is required. Several responses called for consistent heritage terminology aligned with national frameworks and Historic England guidance, while others suggested incorporating measures for energy efficiency, climate adaptation in historic buildings, and urban design constraints. Some feedback also noted that the current wording is vague and requires further refinement to address contemporary conservation and planning challenges.

Key themes raised:

- Balancing Conservation with Enabling Development
- Protection of Both Designated and Non-Designated Assets
- Procedural Clarity and Proportionality in Decision-Making
- Clarity and Consistency in Heritage Terminology
- Alignment with National Policy and Best Practice
- Heritage Impact Statement Requirements
- Energy Efficiency and Climate Adaptation in Historic Buildings

**Overview of SDNPA response and way forward for the Local Plan**

The National Planning Policy Framework requires local plans to set a positive strategy for the conservation and enhancement of the historic environment, including the safeguarding of heritage assets. In addition, the first purpose of National Parks is to conserve and enhance cultural heritage of the area.

Wording Changes

A number of comments include proposed wording changes. Local plans must be consistent with, but not unnecessarily repeat, NPPF paragraphs. In conjunction, the Development Plan must be read as a whole and a number of issues and proposed wording changes are addressed in other policies in the Plan and do not need to be repeated in Policy SDL6. In particular, Policies SDL1, SDL2, and SDN9 address landscape character, design, and energy efficiency, respectively. In response to other, and more specific, proposed wording changes:

- Some proposed wording changes to improve readability have been made.

- Criterion 2 updated to state “where relevant” and “up-to-date”.
- The new supporting text provides further explanation about “cultural heritage” and the glossary defines “local distinctiveness” and “setting”.
- The term “sufficient” is used in the adopted local plan and some wording has been included in the supporting text to provide clarity on this matter.
- Development proposals are considered on their merits and in accordance with the Development Plan, and so additional wording for “enabling development” is not considered to be necessary.
- To address matters related to climate change and historic assets, former policy SD14 is integrated, with amendments, into this policy.

As for points of clarification:

- Landscape includes townscape and this has been made clear in the supporting text and glossary.
- “Heritage Impact Statement” is an update in language and the requirements for when a Heritage Statement or Heritage Impact Statement is required is set out in the Local Validation List.
- This policy provides wording to support the “optimum viable use” of heritage assets. This will be specific to each asset and, therefore, cannot be specifically identified in this strategic policy.

**Policy SDL7 Listed Buildings (previously Policy SD13)**

Number of comments on policy: 30

Number of additional responses to technical questions: n/a

**Reaction to Regulation 18 Consultation**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
7	7	3	7	1	6

**Summary of issues and key themes raised**

Respondents stressed that adaptive reuse and flexible alterations should allow internal modifications and renewable energy upgrades for listed buildings, provided that key architectural features remain intact and public benefits clearly outweigh any harm. Opinions on policy wording varied, with some noting internal consistency while others sought clarification of terms like ‘public benefits’ and ‘setting’, and some considered the policy included excessive detail that resemble design guidance. Maintaining the condition of heritage assets was seen as essential, with calls for criteria that support conservation even when buildings are in disrepair and for measures that ease administrative burdens, including high costs and extensive paperwork. There was also a preference for policies that support energy efficiency improvements, such as modern heating systems, insulation, and solar panels, without compromising historic fabric. Suggestions also included a more modern approach that acknowledges the diverse nature of listed buildings alongside broader environmental priorities.

**Key themes raised:**

- Adaptive Reuse and Flexible Alterations
- Clarity and Consistency of Policy Wording
- Maintaining Condition and Conservation of Heritage Assets
- Energy Efficiency and Sustainable Retrofits

**Overview of SDNPA response and way forward for the revised Local Plan**

The South Downs Local Plan must address the National Planning Policy Framework (NPPF) and the statutory purposes of National Parks. The NPPF requires local plans to set a positive strategy for the conservation and enhancement of the historic environment, including the safeguarding of heritage assets. In addition, the first purpose of National Parks is to conserve and enhance the cultural heritage of the area.

The word “preserve” is consistent with listed building legislation. The word “only” was agreed as appropriate in the adopted South Downs Local Plan in the context of the first purpose of the National Park. Listed buildings form an important part of the historic environment and cultural heritage of the National Park and, therefore, the policy wording of Criterion 2 is considered appropriate.

Energy efficiency and renewable energy criteria for heritage assets such as listed buildings is incorporated into SDL6.

Buildings do not exist in isolation and have relationships with their context, including their landscape context. The addition of the landscape character into this policy makes the requirement to consider this link clear alongside other policies in the local plan. The new supporting text for landscape policies – and the local plan glossary – include a definition of landscape that includes townscape.

Please also note that criterion 1a is only relevant where the internal layout is part of the significance of the listed building. The policies of a local plan can only apply to development and cannot be used to enforce matters outside of the planning system. Finally, for clarification, archaeology is addressed in Policy SDL9, and the setting of a heritage asset is included in the glossary and that definition does not restrict scope of setting to redline or ownership boundaries.

**Policy SDL8 Conservation Areas (previously Policy SD15)**

Number of comments on policy: 35

Number of additional responses to technical questions: n/a

**Reaction to Regulation 18 Consultation**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
6	8	8	1	3	10

**Summary of issues and key themes raised**

Respondents indicated that the policy should ensure that new developments complement conservation areas through clear, enforceable guidelines that prevent discordant scales and features. They suggested that improved drafting and more precise terminology—such as using “conserve” instead of “preserve”—along with clearer definitions, would align the policy more closely with national standards. Robust monitoring, enforcement and a formal appraisal programme were also deemed essential, while detailed guidance on integrating energy efficiency and renewable measures was called for, particularly regarding the sensitive placement and screening of heat pump external units. A balanced approach to weighing potential harm against public benefit was noted, as was the need to address implementation challenges and enhance policy coherence, especially in clarifying the hierarchy between conservation aims and climate change objectives.

Key themes raised:

- Design Control and Development Compatibility
- Clarity and Terminology
- Monitoring, Appraisal and Review Mechanisms
- Energy Efficiency, Renewable Integration and Sensitive Adaptation

**Overview of SDNPA response and way forward for the Local Plan**

The National Planning Policy Framework requires local plans to set a positive strategy for the conservation and enhancement of the historic environment, including the safeguarding of heritage assets. In addition, the first purpose of National Parks is to conserve and enhance cultural heritage of the area. Conservation areas are an important part of the historic environment and cultural heritage of the national park

In response to the comments relevant to this policy’s wording, the word “preserve” has been changed to “conserve” in SDL8.1. Definitions of key terms such as “setting” are incorporated into the glossary.

Requirements for renewable energy and energy efficiency of heritage assets is now integrated into SDL6 (previously SD12).

A number of comments either do not relate to the policy, or relate to specific sites or implementation rather than policy wording.

## Policy SDL9 Archaeology (previously Policy SD16)

Number of comments on policy: 24

Number of additional responses to technical questions: n/a

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
7	13	13	1	0	23

### Summary of issues and key themes raised

Respondents called for archaeological finds to be managed in a way that enhance public accessibility through structured schemes for investigation, assessment, publication, and public access to archives and on site such as school visits, temporary exhibitions, on-site mini-museums, and community projects. Clearer terminology is also sought - some questioned the clarity of terms like “public engagement.” They recommended that heritage impact statements include detailed assessments of archaeological and heritage assets, with specific language to define terms such as “significant” and to delineate archaeological areas. Some feedback noted that the policy’s restrictions and specialist focus might benefit from a more flexible approach, particularly to support sustainable farming practices. Respondents also emphasised that development proposals should incorporate effective mitigation measures to reduce harm to archaeological assets and that the policy align with national frameworks and established guidance.

#### Key themes raised:

- Public Engagement and Educational Opportunities
- Enhanced Assessment Criteria
- Mitigation and No-Harm Principle
- Consistency with National Frameworks

### Overview of SDNPA response and way forward for the revised Local Plan

The National Planning Policy Framework requires local plans to set a positive strategy for the conservation and enhancement of the historic environment, including the safeguarding of heritage assets. In addition, the first purpose of National Parks is to conserve and enhance cultural heritage of the area. The requirements for using relevant Historic England guidance notes is set out in the overarching strategic policy on the historic environment and cultural heritage (SDL6). In terms of other comments:

- SDL9.3 amended to include “assessment” and “analysis” in last sentence.
- New supporting text and glossary wording added to help explain “significance”.
- Wording added to the supporting text on recording findings and public access.
- Comments related to site allocations have been considered under the relevant allocation policy and not within the wording of SDL9.

Some comments are also made on matters beyond the scope of the Local Plan.